

Comments on NPRM ET docket 03-104

As a licensed Amateur Radio operator, I have grave concerns about interference to high frequency radio communications by Broadband over power lines (BPL). Engineering studies by the American Radio Relay League show that PL causes interference to such a degree that communications become nearly impossible. Although your NPRM does add new constraints on BPL to protect licensed services, the proposed changes still do not adequately provide protection.

Power companies have shown a reluctance to deal with interference problems caused by their existing equipment. Several Amateur Radio operators in my area have been plagued with interference from defective transformers, and the power company's response to their complaints has been slow and inadequate. Without adequate regulations to force utility companies to deal promptly and effectively with interference complaints, communications can be disrupted for extended periods, putting at risk our capability of providing emergency services when needed.

At a minimum, the power companies should be required to hold public hearings before initiating Access BPL, provide telephone numbers and internet sites for interference complaints, and be required to resolve those complaints within a brief period of time (5 to 10 days). The power companies should be required to present the negatives with the positives when promoting this service. Prospective customers should be advised that radio communications can interfere with their BPL access, and that portions of the system may need to be shut down on short notice to eliminate interference to licensed services.

Although Access BPL has been touted as the best means of bringing high speed internet services to rural areas, it is unlikely that those rural areas will be adequately served. Taking into consideration equipment costs, it would seem likely that initial BPL installations will take place in population centers that are already adequately served with non interfering services. Therefore it would seem that BPL solves a problem that does not exist.

Without adequate controls, BPL can effectively shut down communications on the high frequency bands. In addition to Amateur Radio, military, FEMA, Air Traffic Control and other critical functions are likely to have interference problems. In this age of terrorism, interference with critical emergency communications weakens our security as a nation. Please take this into consideration when revising your regulations.

Thank you,

Jess Young, W8JY